

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
BOSTON DISTRICT**

JOYCE ROWLEY,
PLAINTIFF, PRO SE

CASE No. 21-cv-11649-FDS

V.

CITY OF NEW BEDFORD, MASSACHUSETTS
DEFENDANT

Second Supplemental to Plaintiff's Reply

Joyce Rowley, Plaintiff pro se, files this second supplement to her reply to Defendant City's response. Due to technical difficulties, Exhibit 8, Ms. Buckley's affidavit was not submitted with Plaintiff's Reply. Ms. Buckley's affidavit is herewith attached.

Respectfully submitted,
/s/Joyce Rowley
Plaintiff, pro se
PO Box 50251
New Bedford, MA 02745
Ph: 508-542-8297

EXHIBIT 8

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
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JOYCE ROWLEY,
PLAINTIFF, PRO SE

CASE NO. 21-CV-11649-FDS

V.
CITY OF NEW BEDFORD, MASSACHUSETTS
DEFENDANT

Affidavit of Carol Buckley

I, Carol Buckley, hereby attest that:

1. I have 47 years experience transporting, retiring, managing and caring for captive-held elephants in the United States and Southeast Asia.
2. I am founder and CEO of Elephant Aid International (EAI), a nonprofit organization which provides elephant care training to elephant managers in Nepal, Thailand, and India; welfare relief for needy elephants in Asia; and elephant retirement options in the US.
3. As CEO and program manager for EAI, I oversee operations at Elephant Refuge North America (ERNA) located in Attapulgus, Georgia.
4. ERNA is an 850-acre natural habitat elephant retirement facility located in a warm southern climate of South Georgia, for up to 10 elephants. It has a climate-controlled elephant house, three fenced habitats (seven acre/100 acre/ 700 acre) consisting of pastures, forests, streams and ponds for elephant welfare and autonomy. ERNA consults with a veterinary team, employs a local veterinarian and has a vet tech on staff.

5. ERNA currently houses two Asian elephants; Bo, a 35-year-old captive-born castrated male and Tarra, a 47-year-old female. Both are compatible, living together in the habitat and utilize the barn when desired.

6. I co-founded The Elephant Sanctuary in Tennessee (TES) in 1995 in Hohenwald, Tennessee on 113 acres of farmland. By 2010, TES had expanded to 2,700 acres of fenced natural pastures, forests, streams and ponds, consisting of three separate elephant housing and care facilities; a 200-acre quarantine facility; a 300-acre African elephant facility; and a 2200-acre Asian elephant facility, all with separate elephant houses, fenced habitats, and staff.

7. I was the CEO of TES from 1995 to 2010. During that time, I received 23 retired elephants—21 Asian elephants and 2 African elephants, from zoos and circuses.

8. I have offered to take custody of Asian elephants Ruth and Emily should they be retired from the Buttonwood Park Zoo in New Bedford, MA.

9. I have offered to provide transport as needed if they are retired from the Zoo.

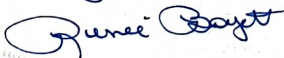
I hereby swear that the above statements are true based on my personal knowledge.

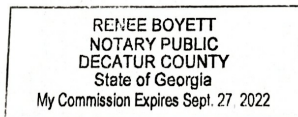
Sworn this 2nd day of February, 2022.



Carol Buckley

Notary:





CERTIFICATE OF SERVICE

This is to certify that Plaintiff Joyce Rowley has served a copy of this document on this date by ECF to Defendant's attorney of record John Markey, Markey & Walsh, LLC, at jmarkey@msmw-law.com and Kreg Espinola, New Bedford Assistant City Solicitor, via email at kespinola@bevlegal.com.

Respectfully submitted,
/S/Joyce Rowley
Plaintiff pro se
PO Box 50251
New Bedford, MA 02745

February 8, 2022